

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 11-cr-20066-8 &
11-cr-20129-14

vs.

Hon.: Robert H. Cleland

MICHAEL RICH,

Defendant.

_____ /

MOTION FOR NON-CUSTODIAL TRAVEL EXPENSES

NOW COMES Defendant Michael Rich, by and through his attorney, Robert M. Morgan, and moves this Honorable Court to enter an Order authorizing payment of non-custodial travel expenses, showing as follows:

1. On October 10, 2012, the Court issued a Notice of Status Conference Re: Bond requiring Defendant's personal appearance on October 23, 2012.
2. Undersigned counsel is a CJA panel attorney and Defendant is financially unable to provide the necessary transportation to travel from Anniston, Alabama to Detroit, Michigan.
3. The interests of justice would be served in this instance as it commonly occurs in other CJA cases, by directing the U.S. Marshall to provide one-way, non-custodial transportation expenses for the Defendant to travel to Detroit.

WHEREFORE, Defendant prays this Honorable Court enter an Order

directing the U.S. Marshall to provide one-way, non-custodial transportation expenses for the Defendant to travel to Detroit, Michigan to make his court appearance on October 23, 2012.

Respectfully submitted,

/s/ Robert M. Morgan
ROBERT M. MORGAN P23144
Counsel for Defendant
615 Griswold, Suite 1125
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(313) 961-7070
morgancrdefense@ameritech.net

Dated: October 17, 2012

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 11-cr-20066-8 &
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MICHAEL RICH,

Defendant.

BRIEF IN SUPPORT OF MOTION FOR NON-CUSTODIAL TRAVEL
EXPENSES

Defendant is represented by CJA appointed counsel because of his indigency. The Court has the authority to order that Defendant be provided non-custodial travel by the United States Marshall. See e.g. 18 U.S.C. § 4282, 4285.

WHEREFORE, Defendant prays this Honorable Court enter an Order directing the U.S. Marshall to provide one-way, non-custodial transportation expenses for the Defendant to travel to Detroit, Michigan to make his court appearance on October 23, 2012.

Respectfully submitted,

/s/ Robert M. Morgan
ROBERT M. MORGAN P23144
Counsel for Defendant
615 Griswold, Suite 1125
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PROOF OF SERVICE

Debbie Damian hereby states that on October 17, 2012, I electronically filed *Motion for Non-Custodial Travel Expenses, Brief in Support of Motion and Proof of Service* with the Clerk of the Court using the ECF system which will send notification of such to the following:

Robert M. Morgan at morgancrdefense@ameritech.net;
Saima Mohsin at saima.mohsin@usdoj.gov; and
Eric Straus at eric.straus@usdoj.gov

/s/ Debbie Damian
Legal Assistant for Robert M. Morgan
debbieg0327@gmail.com